

## **EXHIBIT C**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS**  
Sherman Division

ED BUTOWSKY,

Plaintiff,

v.

DOUGLAS H. WIGDOR, JEANNE M.  
CHRISTENSEN, MICHAEL J. WILLEMIN,  
DAVID E. GOTTLIEB, LAWRENCE M.  
PEARSON, ROD WHEELER, WIGDOR LLP,

Defendants.

Case No.: 4:19-cv-00577

**DECLARATION OF DAVID E. GOTTLIEB**

I, David E. Gottlieb, hereby declare as follows:

1. My name is David E. Gottlieb. I am over eighteen years of age and am fully competent and authorized in all respects to execute this affidavit. I have personal knowledge of the facts hereinafter stated, which are true and correct, and if called as a witness, would testify competently thereto.
2. I am a resident of the State of New York.
3. I am a partner of and practicing attorney at Wigdor LLP, a New York limited liability partnership, organized under the laws of New York. I am duly licensed to practice law in New York, and my practice is based in New York.
4. My law firm does not maintain an office or any other presence in the State of Texas.
5. I have never resided in the State of Texas.
6. I have never traveled to or through the State of Texas for any business purpose.

7. I have never traveled to or through the State of Texas for any leisure or personal purpose.

8. I neither own nor have any ownership interest in any real property located in the State of Texas. I have never owned real property in Texas.

9. I do not lease or rent any real property in the State of Texas for any purpose. I have never leased or rented real property in Texas.

10. I do not maintain a post office box or other mailing address in Texas.

11. I do not maintain a phone number in Texas, or with a Texas area code.

12. I neither own nor have any ownership interest in any personal property located in the State of Texas. I have never leased or rented any personal property in Texas.

13. I do not pay taxes to the State of Texas, and have never done so.

14. I have neither sought admission to nor have I been admitted *pro hac vice* to any Texas State or Federal Court.

15. I have never participated in any meetings, hearings, witness interviews, or depositions in Texas via video conference, Skype, or any similar “virtual presence” technology.

16. To the best of my knowledge, I have never granted an interview to a Texas-based newspaper, television station, radio station, or any other media outlet exclusively serving Texas.

17. I hold no professional licenses or credentials issued by the State of Texas.

Pursuant to 28 U.S.C. § 1746, I declare under penalties of perjury that the foregoing is true and correct. Executed this 9th day of December, 2019.

A handwritten signature in blue ink, appearing to read "D. E. Gottlieb", is written over a horizontal line.

David E. Gottlieb